

Matt Kezhaya
150 S. Fifth St., Suite 1850
Minneapolis, MN 55402



matt@kezhaya.law
Direct: (479) 431-6112
General: (612) 276-2216

BY ECF

June 12, 2024

The Honorable Mary Kay Vyskocil
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: *Satanic Temple v. Newsweek* (22-CV-1343) – request to seal and to refile with redactions

Dear Judge Vyskocil:

Pursuant to Individual Civil Rule 9(B), The Satanic Temple requests leave to seal a selection of Julia Duin's deposition under seal (ECF No. 124-1); and for leave to refile the redacted version of the same. A proposed redacted version is attached as **Exhibit 47**. Newsweek stipulates that this request should be granted.

The material to be sealed and then redacted pertains to Duin's compensation amounts. The compensation amount was provided under the protective order (ECF No. 38) and was previously filed in redacted format in the context of a discovery dispute. See ECF Nos. 79 (Newsweek's letter motion), 81 (order granting same). As grounds to file a redacted version of the transcript, Newsweek cited *Dodona I, LLC v. Goldman, Sachs & Co.*, 119 F. Supp. 3d 152 (S.D.N.Y. 2015). In *Dodona*, it was salient that the information was "not relevant to the parties' legal dispute and implicate legitimate privacy interests." 119 F. Supp. at 157. The same is true here.

WHEREFORE Plaintiff respectfully requests a directive that the Clerk should seal ECF No. 124-1 (Plaintiff's Exhibit 47) and leave to refile the attached instead.

Respectfully submitted,
By: /s/ Matt Kezhaya
Matt Kezhaya (*pro hac vice*)
KEZHAYA LAW PLC
150 S. Fifth St., Suite 1850
Minneapolis, MN 55402
phone: (479) 431-6112
email: matt@kezhaya.law

CERTIFICATE OF SERVICE

NOTICE IS GIVEN that I, Matt Kezhaya, efiled the foregoing document by uploading it to the Court's CM/ECF system on June 12, 2024, which sends service to registered users, including all other counsel of record in this cause.

s/ Matt Kezhaya